

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

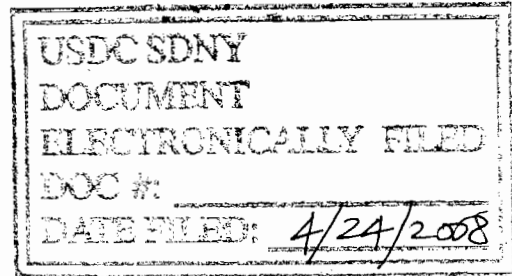
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BRICKMAN INVESTMENTS, INC.,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

v.

SECURITY CAPITAL ASSURANCE LTD.,
PAUL S. GIORDANO, DAVID SHEA,
GOLDMAN, SACHS & CO., J.P. MORGAN
SECURITIES INC., MERRILL LYNCH,
PIERCE, FENNER & SMITH
INCORPORATED and XL INSURANCE LTD.,

Defendants.
-----X



ECF CASE

No. 07-CV-11086 (DAB)

JOINT STIPULATION

WHEREAS, on February 5, 2008, motions for appointment of lead plaintiff and approval of lead counsel were filed by (i) the Employees Retirement System of the State of Rhode Island ("Rhode Island"), (ii) the United Food and Commercial Workers Union Local 655 AFL-CIO, Food Employers Joint Pension Plan and District No. 9, I.A. of M. & A.W. Pension Trust (collectively, the "UFCW/District 9 Group") and (iii) HGK Asset Management, Inc. ("HGK"); and

WHEREAS, HGK sought to be appointed on behalf of a discreet group of SCA bondholders, namely all those who acquired 6.8% 12/31/49-17 securities pursuant to traceable to the registration statement that was filed in connection with SCA's Offer to Exchange of November 19, 2007 (the "Bondholder Claimants"); and

WHEREAS, Rhode Island, the UFCW/District 9 Group and HGK each opposed the others' motions on various grounds; and filed papers in support of their motions; and

WHEREAS, HGK examined the various papers in support of the motions, and believe Rhode Island clearly has the largest financial interest in this litigation and can well satisfy all the

requirements of the Private Securities Litigation Reform Act ("PSLRA") and can best represent all the security holders of SCA, in an effort to simplify the issues before the Court on the pending motions;

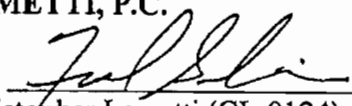
IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, as follows:

1. HGK's motion for appointment of lead plaintiff and approval of lead counsel is hereby withdrawn in favor of Rhode Island; and

2. In the event that Rhode Island is appointed lead plaintiff in this matter, HGK shall be included in the consolidated amended complaint as an additional named plaintiff and shall be put forth as a proposed class representative on behalf of the SCA bondholders.

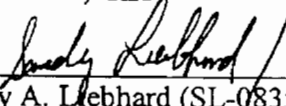
Dated: New York, New York
March 6, 2008

**SCHOENGOLD SPORN LAITMAN &
LOMETTI, P.C.**

By: 
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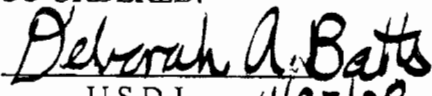
Attorneys for HGK Asset Management, Inc.

**BERNSTEIN LIEBHARD &
LIFSHITZ, LLP**

By:  */ with permission*
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*Proposed Lead Counsel for the Class
and Attorneys for Rhode Island*

SO ORDERED:


U.S.D.J. 4/23/08